



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 25, 2023

BY ECF

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Street
New York, New York 10007

**Re: *United States v. Joshua Adam Schulte,*
S2 17 Cr. 548 (JMF)**

Dear Judge Furman:

The Government respectfully writes regarding the pretrial deadlines in advance of trial starting on September 11, 2023. Expert disclosures are currently due on May 26, 2023. (D.E. 1033.) In advance of that deadline, and at defendant's request, the Government arranged for the defendant's forensic computer expert to review the defendant's home desktop materials between May 15 and May 19 at the Government's offices. On May 10, this expert unexpectedly canceled his planned review and asked to reschedule for the week of June 12th. As such, the defendant is currently unable to comply with the expert disclosure requirements under Fed. R. Crim P. 16(b)(1)(C) before the May 26 deadline.

Based on the defense expert's inability to review the home desktop materials prior to the current expert disclosure deadline, the Government respectfully requests that the Court enter the proposed modified schedule below. The proposed changes will accommodate the defense computer expert's review while allowing the parties to engage in motion practice (including issues related to expert disclosures) sufficiently in advance of trial. The Government has communicated with standby counsel regarding the proposal and understands the defendant objects to any pretrial schedule based on his professed inability to review discovery.

Deadline	Current Date	Proposed Date
Parties' expert disclosures	May 26, 2023	June 30, 2023
Motions in Limine and Requests to Charge	June 9, 2023	July 14, 2023
Responses to Motions in Limine and Requests to Charge	June 23, 2023	July 28, 2023

Respectfully submitted,

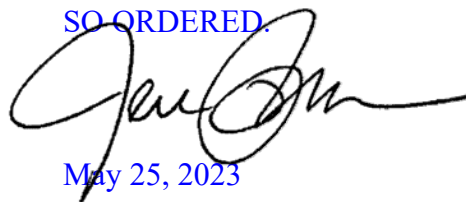
DAMIAN WILLIAMS
United States Attorney

by: _____/s/_____
David W. Denton, Jr. / Michael D. Lockard /
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cc: Counsel of record (by ECF)
Joshua Adam Schulte (by U.S. Mail)

Application GRANTED. The Clerk of Court is directed to terminate Docket No. 1049.

SO ORDERED.

A handwritten signature in black ink, appearing to be "J. Schulte", is written over the text "SO ORDERED." and the date "May 25, 2023".

May 25, 2023